Exhibit F

DrinkerBiddle&Reath LLP

Susan M. Sharko
973-549-7350 Direct
Susan.Sharko@dbr.com

Law Offices
600 Campus Drive
Florham Park, NJ
07932-1047
973-549-7000 phone
973-360-9831 fax
www.drinkerbiddle.com

A Delaware Limited Liability Partnership

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August 6, 2015

VIA FACSIMILE AND MAIL

Adam M. Slater, Esq.
Mazie Slater Katz & Freeman LLC
103 Eisenhower Parkway
Roseland, New Jersey 07068

Re: In re Benicar (Olmesartan) Products Liability Litigation
MDL No. 2606

New Jersey Consolidated Olmesartan Litigation
Docket No. ATL-L-504-14

Dear Mr. Slater:

I write in response to your August 5, 2015 letter regarding the July 29, 2015 meet and confer on discovery. Your letter is not productive. We decline to annotate your previous seven-page August 3 letter or respond line-by-line to the many inaccurate statements contained therein. Let's do what we are supposed to do – talk about the issues you have with our discovery responses. We again repeat our request that plaintiffs identify which of Defendants' discovery responses you are challenging.

I. Time frame.

As we said on July 28, to date, where we have cut off production of documents as of certain date, we have specified that in the answers. As we said on July 28, we will continue to do that. We cannot agree that going forward, there will never be a temporal cut-off. It depends on the request. We have and will continue to address each request independently in accordance with the Federal Rules.

II. Adverse Event Reports

As you are aware, on December 9, 2014, in the New Jersey Consolidated Litigation, Judge Nelson C. Johnson, J.S.C., ordered that: "Since Plaintiffs' alleged injuries are limited to intestinal or colonic disease manifestations know as sprue-like enteropathy, and/or lymphocytic colitis, microscopic colitis, or collagenous colitis, chronic diarrhea, weight loss, nausea, vomiting, malnutrition, and dehydration, the discovery of adverse event reports shall be limited to those symptoms[.]"

Andrew B. Joseph
Partner responsible for Florham Park Office

Established 1849

The defendants fully complied with the Order, and on January 9, 2015 produced 7,226 pages of adverse event reports to your lead counsel, Ms. Kessler. The production was based on 41 MedDRA standardized preferred term events that encompass the terms specified in the Court's December 9 Order. Ms. Kessler was given the list of the terms used on December 4, 2014.

Besides MedWatch forms, defendants have also produced the INDs, NDAs, FDA Annual Reports, Periodic Adverse Drug Experience Reports (PADERs) and Periodic Safety Update Reports (PSURs), all of which include adverse event information. As previously offered to Ms. Kessler in December, and again to you on July 28, if plaintiffs want defendants to consider searching for additional MedDRA standardized preferred terms relating to the claims at issue in this litigation, please identify them.

As to plaintiffs' demand for production of adverse event reports made by the Daiichi U.S. Defendants to foreign regulatory authorities, there are none. Defendants advised in their response to plaintiffs' Request for Production that Daiichi Sankyo, Inc. is responsible for olmesartan products in the United States. The Daiichi U.S. Defendants therefore do not report to "foreign regulatory authorities."

You told us on July 28 you want every adverse event report ever filed. We decline, as we told you on July 28. This issue has been litigated, Judge Johnson has ruled on this issue in his December 9 order and memorandum, and defendants have complied fully with Judge Johnson's ruling, which applies to all New Jersey State Court cases, not just the Rahman case.

You also requested in state court and again on July 28 all back up files for every adverse event ever reported. We decline as we told you on July 28. If there is a specific limited group of back up files you wish to obtain for a good reason, we are willing to discuss that.

III. Foreign Documents.

You asked us to produce all marketing materials from the beginning of time for every country in the world. We decline to do that. The burden and cost of that is overwhelming. The U.S. defendants do not have access to this material. To the extent there are stray or random foreign marketing materials that are picked up in the searches, we will consider the relevance and other issues with regard to production.

You asked us to produce all documents submitted to foreign regulatory authorities all around the world on July 28. We decline. You narrowed the request to documents

from Japan, Germany, France, Spain, the United Kingdom, Australia, and Canada. As we previously stated, the Daiichi U.S. Defendants do not maintain or have access to a global foreign regulatory or marketing database.

IV. Department of Justice Documents

As Judge Johnson noted during the May 8, 2015 Case Management Conference, Plaintiffs' demand for discovery on the Department of Justice civil settlement is a "side issue" which is irrelevant to the main issue in this litigation. Plaintiffs' ongoing demands on this issue clearly are intended for purposes of harassment.

At the July 28 meeting you asked about these specific issues:

- Will we produce the personnel files of the individuals who were the relators in the qui tam actions? We will not.

- You asked about a privilege log on the requested documents. We do not think a specific detailed privilege log is appropriate here given the lack of relevance of the documents and the fact that a large number are from attorneys who were involved in the investigation and defense of the matter. We will give this request further consideration.

- You asked about payments to physicians. As we told you, our position is that to the extent discovery is permitted on this, you will get the information through the DFS.

- You asked about documents created in connection with the Corporate Integrity Agreement dated January 7, 2015. We decline to produce such documents.

- You asked about the Company documents which were produced to the DOJ in response to the subpoena. As we explained, to the extent such documents are relevant to the products liability litigation we have or will produce them to you. We decline, however, to duplicate the documents we produced to the DOJ and produce them here.

V. Clinical and Pre-Clinical Trials

At the July 28 meeting you said you wanted every piece of paper for every study done anywhere in the world. We believe that this is an extraordinarily broad request, disproportionate and burdensome. We can invite you to identify the specific clinical

trials in which you are interested and we will look into the burden and feasibility of production so long as that information is located in the United States.

VI. ROADMAP

Your requests were served on June 29. The Court stayed our obligation to respond to same. Nevertheless, we will endeavor to get you our objections by the end of the month, noting the Court's suggestion that objections and substantive responses be bifurcated. We are also looking into what ROADMAP documents exist in the United States.

I remain available to meet and confer with you on Friday August 7 before 11 a.m. I note the August 11 deadline for conclusion of the meet and confer process and look forward to hearing from you.

Very truly yours,

DRINKER BIDDLE & REATH LLP

Susan M. Sharko

cc: Stuart Goldenberg, Esq.
Lexi Hazam, Esq.
Daniel Nigh, Esq.
Steve Resnick, Esq.
Pete Weinberger, Esq.
Richard Golomb, Esq.
Rayna Kessler, Esq.

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DRINKER BIDDLE & REATH LLP

A Delaware Limited Liability Partnership
600 Campus Drive
Florham Park, New Jersey 07932-1047

Main Number:(973) 360-1100
Fax:(973) 360-9831

FROM: Susan Sharko
DIRECT DIAL: 973-549-7350

DATE: August 6, 2015
CLIENT/MATTER #: 510357

PLEASE DELIVER AS SOON AS POSSIBLE TO:

	RECIPIENT	COMPANY	FAX NO.	PHONE NO.
1.	Adam Slater, Esq.	Mazie Slater Katz & Freeman, LLC	973-228-0303	
2.	Rayna E. Kessler, Esq.	Robins Kaplan Miller & Ciresti LLP	212-980-7499	
3.	Daniel Nigh, Esq.	Levin Papantonio Thomas Mitchell Rafferty & Proctor PA	850-435-7020	
4.	Steven Resnick, Esq.	Golomb& Honik, P.C.	215-985-4169	
5.	Lexi Hazam, Esq.	Lieff Cabraser Heimann & Bernstein	415-956-1008	
6.	Stuart Goldenberg, Esq.	GoldenbergLaw	612-367-8107	
7.	Pete Weinberger, Esq.	Spangenberg Law Firm	216-696-3924	
8.	Richard M. Golomb, Esq.	Golomb & Honik	215-985-4169	

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A Delaware Limited Liability Partnership
600 Campus Drive
Florham Park, New Jersey 07932-1047

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600 Campus Drive
Florham Park, New Jersey 07932-1047

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A Delaware Limited Liability Partnership
600 Campus Drive
Florham Park, New Jersey 07932-1047

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Fax:(973) 360-9831

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600 Campus Drive
Florham Park, New Jersey 07932-1047

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A Delaware Limited Liability Partnership
600 Campus Drive
Florham Park, New Jersey 07932-1047

Main Number:(973) 360-1100
Fax:(973) 360-9831

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A Delaware Limited Liability Partnership
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Florham Park, New Jersey 07932-1047

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